

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In Re:

KIMBERLY WRIGHT,
Debtor

MANCHESTER TOWNSHIP,
Movant

v.

KIMBERLY WRIGHT

AND

CHARLES J. DEHART, III
CHAPTER 13 TRUSTEE,
Respondents

Chapter 13

Case No. 1-18-bk-00373-HWV

MANCHESTER TOWNSHIP'S RESPONSE TO DEBTOR'S
NOTICE OF MOTION TO DISMISS PROCEEDINGS IN DEBT LAWSUIT WITH DEBT
COLLECTOR, PLAINTIFF'S CGA LAW FIRM, IT'S (SIC) ATTORNEY'S (SIC),
LAWRENCE V. YOUNG, ESQUIRE, MANCHESTER TOWNSHIP

COMES NOW, this 15th day of May, 2018, Manchester Township, by and through its attorneys, CGA Law Firm, Lawrence V. Young, Esquire, and responds to Debtor's Motion to Dismiss as follows:

1. Proof of Claim #2-1 filed in the within case by Manchester Township on April 24, 2018 includes supporting documentation evidencing the debt owed to Manchester Township by the Debtor. A copy of that Proof of Claim and the supporting documentation is attached hereto incorporated herein by reference as Exhibit "A."

2. It is believed that service of process was properly made upon the Debtor.

3. This is not required by law as Lawrence V. Young is an attorney licensed by the Commonwealth of Pennsylvania.

4. There were no false accusations made.

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WHEREFORE, it is requested that the Debtor's Motion to Dismiss be denied and that the Motion to Dismiss, itself, be dismissed with prejudice.

Respectfully submitted,

CGA Law Firm

/s/Lawrence V. Young, Esquire

Lawrence V. Young, Esquire

Supreme Court No. 21009

135 North George Street

York, PA 17401

Telephone: 717-848-4900

Attorney for Movant

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CERTIFICATE OF SERVICE

I certify that I am more than 18 years of age and that on May 15, 2018, a true and correct copy of the attached document was served upon the following parties in the following manner:

Name	Mode of Service
Kimberly Wright 2536 Eastern Blvd. #122 York, PA 17402	United States First Class Mail, Postage Prepaid
Charles J. DeHart, III, Chapter 13 Trustee	Via CM/ECF

I certify under penalty of perjury that the forgoing is true and correct.

Dated: 05/15/2018

/s/Lawrence V. Young, Esquire
Lawrence V. Young, Esquire

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